

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO: 4:11CR237
	§	Judge Schell
DANISH SALEEM	§	

GOVERNMENT'S NOTICE OF EXPERT WITNESSES

The government, by and through the undersigned attorney, files this notice of expert witnesses intended to be used in trial on this matter:

1. Sergeant Chris Meehan: Sergeant Meehan is employed at the Collin County Sheriff's Office, where he is assigned to the Internet Crimes Against Children Task Force. A copy of his biography is attached. Sergeant Meehan performed forensic examinations on the computer and hard drives that were seized in this case. Based on his training and experience, Sergeant Meehan will testify about the methods that he used to conduct the forensic examination of the computers, and evidentiary items (including images of child pornography and child erotica) that were recovered during the forensic examination. Sergeant Meehan will also provide testimony about how computers and the internet operate. A copy of his report has already been provided to the defendant.

2. Detective Jeff Rich: Detective Rich is employed at the Plano Police Department, where he is assigned to the Family Violence Unit. A copy of his resume is attached. Based on his training and experience, Detective Rich will provide testimony

about how computers and the internet operate. He will also provide testimony to the jury about where certain computer parts are manufactured. Detective Rich can also provide testimony about the forensic examination that was performed on the computer and hard drives in this case. Specifically, he can provide testimony about the location of images of child pornography and child erotica that were located on the computer. Should the Court deem the testimony to be relevant, Detective Rich can also testify about characteristics of individuals who possess and share child pornography and provide information about how individuals locate and share child pornography.

Pursuant to Federal Rule of Criminal Procedure 16(b)(1)(C), the government requests that the defendant provide to the government a written summary of any expert testimony he intends to use at trial.

Respectfully submitted,

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/s/ Mandy Griffith
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CERTIFICATE OF SERVICE

I certify that a copy of the Government's Notice of Expert Witnesses was served via electronic filing to Defense Counsel.

Dated: April 13, 2012

/s/ Mandy Griffith

Mandy Griffith